FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4115

DATE FILMED 4-24-96 CAMERA NO. 4

CAMERAMAN JMN

9604373242 6

George Barlos for Congress Committee
P.O. Box 1915
Biloxi, Mississippi 39533-1915
(601) 875-7561

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT
Nov 8 11 19 AM '94

Nov 1 9 22 AM '94

SENSITIVE

MUR 4115

October 7, 1994

Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

Dear Commission Members:

By this letter The George Barlos for Congress Committee hereby files a complaint against, Gary Eugene (Gene) Taylor, The Democratic party nominee for the U.S. House of Representatives in the 5th Congressional District of Mississippi, the Gene Taylor for Congress Committee ("the Taylor Committee"), and Wayne Weidie, the Chief of Staff at Mr. Taylor's Washington, DC Congressional office, (hereinafter referred to together as "the Respondents") for violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), 2 U.S.C. sec. 431 et seq., and the regulations of the Federal Election Commission ("FEC") implementing the Act, 11 C.F.R. sec 100.1 et seq., Title 18 S 594 U.S.C., and Title 18 S 603 U.S.C.

The Respondents have violated the laws set out above by blatant attempts to illegally use Congressional office to intimidate voters, by using Congressional office staff and resources to illegally influence a U.S. Congressional election, and by failure to place proper disclaimers on communications made through public political advertising. These campaign law violations are of a continuing nature and are likely to give Mr. Taylor an illegal advantage in his campaign for reelection to federal office.

FACTS OF THIS COMPLAINT:

Gary Eugene (Gene) Taylor is the incumbent U.S. Representative of Mississippi's 5th Congressional District. Mr. Taylor is currently seeking reelection. Mr. Wayne Wiedie is employed by Mr. Taylor as the chief of staff in the Taylor Washington, DC Congressional office.

On September 27, 1993 a private reception was held at the Pascagoula home of Mr. and Mrs. Somerville in support of the candidacy of George Barlos, candidate for U.S. Congress and challenger to Mr. Taylor.

9 6 0 4 3 7 3 2 4 2 7

Mr. Somerville is the president of the Chevron Corporation facilities in Mississippi located in Pascagoula.

After invitations for the Somerville reception were mailed Mr. Taylor, Mr. Wiedie, and/or other representatives of Mr. Taylor's Congressional Offices or campaign office telephoned, or otherwise contacted, the Chevron corporation, and/or its represenstatives, to complain of the Somervilles' support for Mr. Barlos' candidacy for U.S. Congress. As a result of those illegal contacts the Chevron Corporation, and/or its representatives, contacted the Somervilles and influenced Mr. and/or Mrs. Somerville to desist in one or both's support for the Barlos campaign.

Other similar examples of intimidation by Mr. Taylor and or his Congressional or campaign staff have occurred since the Somerville reception constituting a pattern of disregard for federal law and the democratic process. Included in this pattern are threatening telephone calls made by Rep. Taylor himself to the Mississippi Press Newspaper of Pascagoula, MS, and to Dr. Carolyn Buttross of Ocean Springs, MS, earlier this year relating to both's perceived opposition to Mr. Taylor.

During the months of July, August, and September of this year various forms of signs and banners have appeared in Mississippi's 5th Congressional District including Taylor headquarter signs and large roadside signs in support of Mr. Taylor's campaign for reelection. These signs carry no proper disclaimer.

THE LAW:

1. Mr. Taylor, Mr. Wiedie, and/or other Taylor staff intimidation of voters.

The contacts with Chevron was a clear attempt at intimidation of voters by way of threat to employment intended to stop financial and voting support. Therefore Mr. Taylor, Mr. Wiedie, and/or other representatives of Mr. Taylor violationed general F.E.C. law as well as Federal law, 18 U.S.C. s 594:

s. 594. Intimidation of voters

Whoever intimidates, threatens, coerces, or attempts to intimidate, threaten, or coerce, any other person for the purpose of interfering with the right of such other person to vote or to vote as he may choose, or of causing such other person to vote for, or not to vote for, any candidate for the office of President, Vice President, Presidential elector, Member of the

96043732428

Senate, Member of the House of Representatives, Delegate from the District of Columbia, or Resident Commissioner, at any election held solely or in part for the purpose of electing such candidate, shall be fined not more than $1,000 or imprisoned not more than one year, or both.

2. Illegal use of Taylor U.S. Congressional staff and resources in a U.S. Congressional election.

Over a period of months Mr. Taylor has illegally used his U.S. Congressional staff and office resources in his bid for reelection. This includes telephone calls to the Chevron corporation, and/or other representatives of Chevron, in attempts to stop financial and voting support for the Barlos candidacy. Mr. Weidie, and/or other representatives of Mr. Taylor's U.S. Congressional office, have thus spent taxpayer time and used government telephones to participate in reelection efforts in behalf of Mr. Taylor. Such use of U.S. Congressional office staff time and resources is in clear violation of the House of Representatives Committee on Standards of Official Conduct and recent case law:

"It is clear from the record that Congress has recognized the basic principle that government funds should not be spent to help incumbents gain reelection." Common Cause v. Bolger, 574 F. Supp. 672 (D.C. District Court 1982), aff'd, 461 U.S. 911 (1983).

2. Failure to Include A Proper Disclaimer.

The FEC's regulations require the following:

[W]henever any person makes an expenditure for the purpose of financing a communication that expressly advocates the election or defeat of a clearly identified candidate. . . through any broadcasting station, newspaper, magazine, outdoor advertising facility, poster, yard sign, direct mailing or any other form of general public political advertising, a disclaimer meeting the requirements. . . shall appear and be presented in a clear and conspicuous manner to give the reader, observer or listener adequate notice of the identity of the persons who paid for and, where required, who authorized the communication.

11 C.F.R. sec. 110.11(a)(1). There is no disclaimer on the large road side signs and headquarter's signs even though such signage is specifically listed as the type of public communications requiring such display of disclaimers.

CONCLUSIONS:

9604373249

In light of the information herein, the George Barlos for Congress Committee respectfully requests that the Federal Elections Commission immediately conduct a full investigation regarding the violations noted in this complaint, enter into prompt conciliation with the Respondents to remedy the violations and to stop further violations.

Incumbent Taylor's pattern of intimidation of voters for the sake of reelection make the prompt and complete investigation of this matter all the more important in order to preserve the validity of the election process.

Particular importance should be placed on obtaining the telephone logs of the Taylor Congressional and campaign offices and their staffs during the time periods of the incident listed above, and other incidents discovered during the investigations, in order to investigate the Respondent's attempt to intimidate voters from financial and voting support of the Barlos campaign as well as the illegal use of Congressional staff in support of Mr. Taylor's reelection.

The Commission should impose all civil penalties on the Respondents based on the violations presented herein and should forward all information gathered during the investigation to the United States Justice Department for criminal review.

Very truly yours

George Barlos

George Barlos for Congress Committe

Subscribed and sworn to
before me this 28th day
of October, 1994.

Notary Public

My Commission expires:

November 17, 1997

9604373240

GEORGE BARLOS

5th Congressional District
P.O. Box 1915
Biloxi, MS 39533-1915
601-875-7561

U.S. CONGRESS
MISSISSIPPI FIRST!

9604373243 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1994

George Barlos
George Barlos for Congress Committee
P.O. Box 1915
Biloxi, MS 39533-1915

RE: MUR 4115

Dear Mr. Barlos:

This letter acknowledges receipt on November 1, 1994, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The respondent(s) will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 4115. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (DZA)
Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

9604373243 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1994

Milton A. Phillips, Treasurer
Gene Taylor for U.S. Congress
412 Highway 90, Unit 11
P.O. Box 38
Bay St. Louis, MS 39520

RE: MUR 4115

Dear Mr. Phillips:

The Federal Election Commission received a complaint which indicates that Gene Taylor for U.S. Congress ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("The Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4115. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

9604373243 3

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (JJM)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

9604373234

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1994

Representative Gary Eugene Taylor
814 S. Beach Blvd.
Bay St. Louis, MS 39520

RE: MUR 4115

Dear Mr. Taylor:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4115. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

9604373243 5

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (JJM)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

9604373243 6

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 8, 1994

Wayne Weidie
Office of Representative Gene Taylor
U.S. House of Representatives
Washington, DC 20515

RE: MUR 4115

Dear Mr. Weidie:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4115. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

9604373243 7

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (JJM)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

9604373243 8

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 8, 1994

Prentice Hall Corporation Systems, Inc.
Registered Agent
Chevron Corporation
32 Lockerman Square, Suite L-100
Dover, DE 19904

RE: MUR 4115

Dear Sir or Madam:

The Federal Election Commission received a complaint which indicates that Chevron Corporation may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4115. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Chevron Corporation in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

9604373243 9

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (gr)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

9604373240

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 8, 1994

Mr. and Mrs. Graham Somerville
3018 Northwood Avenue
Pascagoula, MS 39567

RE: MUR 4115

Dear Mr. and Mrs. Somerville:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4115. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

9604373241

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar (JJM)

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

9604373244 2

CHEVRON CORPORATION-PUBLIC AFFAIRS
575 MARKET STREET, ROOM 950
SAN FRANCISCO, CA 94105

FAX NO.: (415) 894-8468
CONFIRM: (415) 894-4768
(415) 894-2835

Chevron

FEDERAL ELECTION COMMISSION OFFICE OF GENERAL COUNSEL
94 NOV 17 AM 9:31

DATE: November 17, 1994

TO: Ms. Mary L. Taksar
Attorney, Central Enforcement Docket
Fax #(202) 219-3923
Federal Election Commission
Re: MUR # 4115

FROM: John J. Fitzpatrick, Jr., Esq. (415) 894-1502

NUMBER OF PAGES TO FOLLOW THIS PAGE: 1

MESSAGE: Enclosed is Statement of Designation of Counsel in MUR 4115 prior to our discussion on this matter.

Thank you,

John J. Fitzpatrick, Jr., Esq.

cc: Ms. T. C. Lahaderne, Esq. - Fax #(415) 983-1200
Per our discussion regarding MUR 4115.
JJF, Jr.

9 6 0 0 4 3 7 3 2 4 4 3

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4115

NAME OF COUNSEL: John J. Fitzpatrick, Jr., Esq.
Senior Counsel, Chevron Corporate Law Department
ADDRESS: 575 Market Street
Room 956
San Francisco, CA 94105

Teresa C. Lehnderman, Esq.
Pillsbury, Madison & Sutro
235 Montgomery Street
13th Floor
San Francisco, CA 94104

TELEPHONE: (415) 894-1502 (415) 894-5361
FAX (415) 894-8468 (415) 983-1200

RECEIVED FEDERAL ELECTION COMMISSION OFFICE OF GENERAL COUNSEL Nov 18 9 31 AM '94

The above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/16/94
Date

G F Somerville
Signature

11/16/94
Date

Gita Somerville
Signature

RESPONDENT'S NAME: Mr. and Mrs. G. F. Somerville

ADDRESS: 3018 Northwood Road
Pascagoula, MS 39567

HOME PHONE: (601) 769-8430

BUSINESS PHONE: (601) 938-4210

9604373244 4

G. F. SOMERVILLE
3018 NORTHWOOD ROAD
PASCAGOULA, MISSISSIPPI 39567

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Nov 18 12 46 PM '94

November 17, 1994

Dear Ms. Taksar,

RE: MUR 4115

Enclosed please find a completed and executed Statement of Designation of Counsel which authorizes these counsel to make and receive any notification and other communications, to or from the Commission, on our behalf regarding this matter.

Sincerely,

Graham Somerville

Graham Somerville

9604373244 5

cc: John J. Fitzpatrick, Esq.
Teresa C. Lahaderne, Esq.

M. L. Taksar, Esq.
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

MUR 4115

Nov 18 12 46 PM '94

NAME OF COUNSEL:	John J. Fitzpatrick, Jr., Esq. Senior Counsel, Chevron Corporate Law Department	Teresa C. Lahaderne, Esq. Pillsbury, Madison & Sutro
ADDRESS:	575 Market Street Room 956 San Francisco, CA 94105	235 Montgomery Street 13th Floor San Francisco, CA 94104
TELEPHONE:	(415) 894-1502	(415) 894-5561
FAX	(415) 894-8468	(415) 983-1200

The above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/16/94
Date

G F Somerville
Signature

11/16/94
Date

Rita Somerville
Signature

RESPONDENT'S NAME: Mr. and Mrs. G. F. Somerville

ADDRESS: 3018 Northwood Road
Pascagoula, MS 39567

HOME PHONE: (601) 769-8430

BUSINESS PHONE: (601) 938-4210

9604373246

WINSTON & STRAWN

FREDERICK H. WINSTON (1853-1886)
SILAS H. STRAWN (1891-1946)

1400 L STREET, N.W.
WASHINGTON, D.C. 20005-3502

(202) 371-5700

FACSIMILE (202) 371-5950

CHICAGO OFFICE
35 WEST WACKER DRIVE
CHICAGO, ILLINOIS 60601
(312) 558-5600

NEW YORK OFFICE
175 WATER STREET
NEW YORK, NY 10038-4981
(212) 269-2500

GENEVA, SWITZERLAND OFFICE
43 RUE DU RHONE
1204 GENEVA, SWITZERLAND
(4122) 7810608

RIYADH, SAUDI ARABIA OFFICE
THE INTERNATIONAL LAW FIRM
SULAYMANIYAH CENTER
TAHLIA STREET
RIYADH 11495, SAUDI ARABIA
(9661) 4628866

WRITER'S DIRECT DIAL NUMBER
(202) 371-5743

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL COUNSEL

'94 NOV 23 3 50 PM

November 23, 1994

Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Attention: Mary L. Taskar, Attorney
Central Enforcement Docket

Re: MUR 4115/Complaint filed by The Barlos for Congress Committee

Dear Commission Members:

On October 28, 1994, George Barlos, a former congressional candidate for the Fifth District in Mississippi, filed on behalf of The George Barlos for Congress Committee ("the Barlos Committee") a complaint ("Complaint") against Representative Gary Eugene Taylor, The Gene Taylor for Congress Committee, and Wayne W. Weidie, the Chief of Staff for Rep. Taylor. The Complaint alleges that the named respondents violated the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431 et seq., and the implementing regulations promulgated by this Commission, 11 C.F.R. § 100.1 et seq. The complaint further alleges that the respondents violated federal criminal law, 18 U.S.C. §§ 594, 603.

By this letter and the attached exhibits, the respondents answer the allegations in the Complaint.[1]

I. Background

On August 25, 1994, the Democratic Congressional Campaign Committee ("DCCC") filed a complaint against George Barlos, the Republican Party nominee for the U.S. House of Representatives in the Fifth District of Mississippi, the Barlos Committee, the Carolyn

[1] The completed Designation of Counsel Forms are attached hereto as Exhibit 1.

9604332417

Buttross Defense League, and Dr. Donald Booth for violations of the Federal Election Campaign Act of 1971, as amended, and the implementing FEC regulations. The complaint states that Dr. Carolyn Buttross has written letters to the editor in the local press attacking Rep. Taylor and that her husband, Dr. Donald Booth, thereafter formed the Carolyn Buttross Defense League, purportedly to defend his wife against perceived reciprocal attacks by Rep. Taylor and/or his supporters. In advertisements soliciting funds for the Defense League, Dr. Booth contends: "The only way I know how to do this [defend his wife] is to tell you the truth about her ... and about Gene Taylor."

According to the complaint, the Defense League was a guise through which both Dr. Buttros and Dr. Booth could support the candidacy of Mr. Barlos. Indeed, three identical billboards appeared in the district which showed the names "CLINTON/TAYLOR" surrounded by a circle with a slash through the names. The text of the advertisement read "WE DESERVE BETTER. DR. CAROLYN BUTTROSS DEFENSE LEAGUE." See Exhibit 2. The cost of such billboards was $350 per month for each, or $1050 each month.

The complaint further alleged that yard signs produced by the Barlos Committee appeared using the same design as the billboard. The yard signs read on one side: "GEORGE BARLOS, U.S. CONGRESSMAN," and on the other "CLINTON/TAYLOR (surrounded by a circle with a line through the names] STOP THE DECEPTION." These signs did not contain any disclaimer.

The complaint alleges that the expenditures made in connection with the Defense League constituted illegal contributions to the Barlos Committee, that the Defense League was required but failed to register as a political action committee with the Commission, and that the yard signs failed to include the necessary disclaimer.

On October 9, 1994, Dr. Booth informed the Sun Herald (in GulfPort and Biloxi, MS) that he planned to retaliate with an FEC complaint of his own. Respondents believe that the instant complaint filed by the George Barlos for Congress Committee has been submitted within this context and that the allegations, even on their face, lack any merit.

II. The Barlos Complaint

The Barlos complaint makes three sweeping allegations. First, the complaint alleges that one or more of the respondents improperly contacted or otherwise threatened Mr. and Mrs. Graham F. Somerville of Pascagoula, MS. Second, the complaint alleges that Rep. Taylor made "threatening telephone calls" to Dr. Buttross and to the Mississippi Press newspaper of Pascagoula, MS. Third, the complaint alleges that "large roadside signs" and

9 5 0 4 3 7 3 2 4 4 8

signs at the campaign headquarters did not contain the disclaimers required by 11 C.F.R. § 110.11(a)(1). As shown below, each of these allegations is either unsupported and false or otherwise does not constitute a violation of any federal law or regulation.

A. The Somerville Allegation

The Barlos complaint conclusorily alleges that one of the respondents, or someone associated with either the congressional staff or campaign of Rep. Taylor, or someone associated with any of the above, "intimidated" or otherwise caused Mr. and Mrs. Graham Somerville to withdraw their alleged support for Mr. Barlos. This allegation is patently false. Indeed, all of the parties alleged to have been involved in the incident have denied its occurrence.

Both Mr. Weidie, Representative Taylor's Chief of Staff, and Carroll K. Gordon, Assistant Treasurer of the Gene Taylor for Congress Committee, have submitted letters (attached hereto as Exhibits 3 and 4, respectively) denying any attempt to intimidate, threaten or pressure, directly or indirectly, Mr. or Mrs. Somerville. More significantly, however, Mr. Somerville himself has represented to the press that neither he nor his wife was ever contacted by Rep. Taylor or his staff, see Exhibit 5, and we are confident that Chevron, Mr. Somerville's employer, would likewise confirm that no member of Rep. Taylor's staff or campaign committee ever approached any Chevron official to pressure or otherwise to influence the Somerville's political allegiance with respect to any candidate.[2]

Thus, while Mr. Barlos freely alleges that which he cannot support, each of the players purportedly involved in the incident affirmatively states that it never occurred and that the allegation is false. Because Mr. Barlos' allegation lacks any substantiation or credence, it should be dismissed.

B. Dr. Buttross and the Mississippi Press Allegations

Mr. Barlos' allegation that Rep. Taylor made "threatening" phone calls to Dr. Carolyn Buttross and to the Mississippi Press newspaper is likewise unsupported and false.

---

[2] In fact, Mr. Somerville has long supported Rep. Taylor, providing contributions to Rep. Taylor's 1990, 1992 and 1994 campaign efforts. Thus, Mr. Barlos' suggestion that the Somervilles had to be intimidated into supporting Rep. Taylor is clearly wrong.

9 5 0 4 3 7 3 2 4 4 9

The first of the alleged "threatening" telephone calls was between Rep. Taylor and Dr. Buttross. Rep. Taylor had called Dr. Buttross after Ms. Buttross intensified the level of her personal attacks against Rep. Taylor, alleging in a letter to the editor of both the Mississippi Press and the Sun Herald that he "leav[es] his family behind while he lives on a house boat" and that he is "the classic T.V. image of the freewheeling playboy." See Exhibit 6. Upset that Dr. Buttross saw fit to slander him and portray him as unfaithful to his family, and viewing such allegations as "crossing the line," Rep. Taylor telephoned Dr. Buttross to express his disappointment in such personal attacks.

Whatever else may be in dispute, there is absolute no disagreement among the parties that Rep. Taylor never "threatened" Dr. Buttross. He never threatened physical harm; he never threatened to misuse his congressional powers or office, or the stature that comes with it, to punish her. This is implicitly confirmed by none other than Dr. Buttross. In yet another letter to the editor, she alleged that Rep. Taylor was "rude" and "nasty" in the telephone call, that he "attack[ed] my personal integrity," and called her a "liar" and "one of those 'greedy doctors.'" See Exhibit 7. Even assuming arguendo that Dr. Buttross' allegations were accurate (a strained assumption given her partisanship and history of venomous attacks), that simply would not sustain a complaint alleging a violation of law.

A congressman does not check in his First Amendment right to free speech when he is sworn in as a Member of the House of Representative, nor is a candidate in a congressional campaign prohibited from being "rude" or calling someone a "liar." Rep. Taylor, just like any citizen of the United States, is permitted to get angry and tell someone that he believes that she (or he) is "lying" to the public about him.

Absent any allegation by Dr. Buttross that Rep. Taylor physically threatened her or threatened to use the powers of his office to harm her in some way, Rep. Taylor cannot be said to have violated any criminal or civil act. To the contrary, Rep. Taylor's comments plainly constitute protected speech.

Similarly, there is absolutely no support evidencing any "threatening" telephone call made by Rep. Taylor to the Mississippi Press newspaper. Indeed, had there ever been such a telephone conversation, one can rest assured that the Mississippi Press would have led off the next day's newspaper with that story. It did not -- because such a telephone call never took place.

96043132450

C. Campaign Signs

Finally, Mr. Barlos alleges that signs identifying the campaign headquarters, as well as certain road signs, did not carry the requisite disclaimers pursuant to 11 C.F.R. § 110.11(a)(1). However, as explained by Mr. Gordon, see Exh. 4, the campaign headquarters signs did not advocate or endorse Rep. Taylor, nor did they advocate the defeat of Mr. Barlos. To the contrary, they merely identified that location as the headquarters for Rep. Taylor. As such, no disclaimers are necessary for the signs. See 11 C.F.R. § 110.11(a)(1) (emphasis supplied) (requiring a disclaimer only on those signs that "expressly advocate[] the election or defeat" of a candidate). Attached as Exhibit 8 are pictures of certain of the signs apparently the subject of Mr. Barlos' complaint.

Nor can any of the respondents be held responsible for certain road signs which allegedly did not contain the disclaimers. Mr. Gordon, on behalf of the Campaign Committee, represents that they were "erected by individuals unknown to us" and therefore "outside of our control."[3]

III. Conclusion

In sum, Mr. Barlos makes conclusory and unsubstantiated allegations, wholly failing to provide any evidence whatsoever in support. As explained above, the alleged incidents either did not happen, or in the case of the Taylor-Buttross telephone conversation, did not constitute any unlawful conduct. For these reasons, respondents respectfully request that the complaint be dismissed.

Respectfully,

Eric W. Bloom
Counsel for Respondents

[3] Because these signs are estimated to represent an independent contribution less than $250, the person or persons responsible for the posting of these signs would be exempt from registering as independent contributors as required by 11 C.F.R. § 109.2(a).

9604373245 1

Exhibit 1

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4115

NAME OF COUNSEL: Winston & Strawn

ADDRESS: 1400 L Street NW
Washington, DC 20005-3502

TELEPHONE: 202-371-5700

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/23/94
Date

Gene Taylor
Signature

RESPONDENT'S NAME: GENE TAYLOR

ADDRESS: 814 N. Beach Blvd.
Bay St. Louis, MS 39520

HOME PHONE: (601) 467-2894

BUSINESS PHONE: (601) 467-3933

9604373245 2

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4115

NAME OF COUNSEL: Winston & Strawn

ADDRESS: 1400 L Street NW
Washington DC 20005-3502

TELEPHONE: (202) 371-5700

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/23/94
Date

Carroll K Gorlin
Signature

RESPONDENT'S NAME: GENE TAYLOR FOR CONGRESS COMMITTEE

ADDRESS: P O Box 38
Bay ST. Louis, MS, 39520

HOME PHONE: (601) 467 1714

BUSINESS PHONE: (601) 461 3933

9604373245 3

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4115

NAME OF COUNSEL: Eric W. Bloom

ADDRESS: Winston & Strawn
1400 L Street, N.W.
Washington, D.C. 20005

TELEPHONE: (202) 371-5743

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11-23-94
Date

Signature

RESPONDENT'S NAME: Wayne W. Weidie

ADDRESS: 316 G Street, N.E.
Washington, D.C. 20002

HOME PHONE:

BUSINESS PHONE: (202) 225-5772

9604373245 4

One of the Billboards in Bay St. Louis, Ms put up by the Carolyn Buttross Defense league

Exhibit 2

Exhibit 3

November 23, 1994

Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 4115

To Whom it May Concern:

On October 28, 1994, the George Barlos for Congress Committee filed a complaint against Representative Gary Eugene Taylor, the Gene Taylor for Congress Committee, and me. In the four-page complaint, however, Mr. Barlos makes only one factual allegation against me; that is, he alleges that:

> Mr. Weidie and/or other representatives of Mr. Taylor's Congressional Offices or Campaign Office telephoned, or otherwise contacted, the Chevron Corporation and/or its representatives to complain of the Somerville's support for Mr. Barlos' candidacy for U.S. Congress.

Notwithstanding Mr. Barlos' unsupported claims, I have made no contact with any Chevron official at any location in connection with the 1994 campaign, nor have I directed any individual to contact any Chevron official in connection with the campaign. I am certain that Chevron officials can and would confirm this fact. Nor have I or anyone associated with Rep. Taylor's office ever contacted Mr. or Mrs. Graham Somerville to complain about any purported support he or his wife may have provided to Mr. Barlos.

As Chief of Staff to United States Representative Gene Taylor, I have sought to comply fully with the Federal Election Campaign Act of 1971 and am confident that I have done so. I am, however, troubled that a losing candidate for Congress can misuse the FEC process by making spurious allegations to this Committee and then going public with the allegations in an effort to stigmatize the winning candidate.

I trust that the Commission's investigation of this matter will confirm that Mr. Barlos' claims are indeed baseless.

Respectfully,

Wayne W. Weidie

Wayne W. Weidie
Chief of Staff
U.S. Representative Gene Taylor

9604332456

Exhibit 4

November 22, 1994

Federal Election Commission
Washington, DC 20463
Attention: Mary L. Taskar, Attorney
Central enforcement Docket

Re: MUR 4115

Dear Commission Members:

In response to the complaint filed by Mr. Barlos against Representative Gene Taylor, et al., I respond as follows:

1. The facts in paragraphs 3 & 4 of Mr. Barlos' complaint are categorically denied by Mr. Taylor and the members of his congressional staff. At no time did anyone from the Taylor congressional office call to intimidate Mr. Somerville. In fact, Mr. Somerville has expressly confirmed in the local press that no member of the Taylor campaign committee nor any member of Mr. Taylor's congressional staff attempted to intimidate or threaten him.

Mr. Somerville and the Chevron Company PAC have publicly and privately supported Mr. Taylor for many years with campaign contributions. As a result, contact with Mr. Somerville from the campaign office is not unusual and most certainly would not be improper. To be sure, given Mr. Somerville's historic support for Mr. Taylor, it would have made no sense for anyone associated with Mr. Taylor's reelection efforts to "threaten" or seek to "intimidate" Mr. Somerville

Nor did Mr. Taylor at any time make a threatening telephone call to the Mississippi Press or to Dr. Carolyn Buttross. The true facts of the calls to Dr. Buttross and the Press are related in the complaint filed by the DCCC against Mr. Barlos, Dr. Buttross and others for illegal campaign activities.

2. The facts in paragraph 4 refer, apparently, to the signs on the grounds of the campaign headquarters, which were erected merely to identify the offices. (They read "GENE TAYLOR CAMPAIGN HEADQUARTERS".) These signs neither advocate support for or opposition to any candidate nor do the signs include a request for campaign contributions. Because 11 C.F.R. § 110.11(a)(1) requires a disclaimer only on those signs that "<u>expressly</u> advocate[] the election or defeat" of a candidate," the posting of these signs (which merely identify the

9604373245 7

campaign headquarters) plainly conforms with federal law and the FEC regulations. (See enclosed pictures).

In contrast to the campaign headquarter signs, all campaign signs posted by the campaign committee used to solicit support for Mr. Taylor contain the requisite disclaimer prominently, as required.

There are to our knowledge two signs advocating election of Representative Taylor which have been erected by individuals unknown to us. These signs are outside of our control and, in any event, are estimated to represent an independent contribution less than $250. Assuming the accuracy of our estimate, the owners would be exempt from registering as independent contributors as required by 11 CFR 109.2(a).

Because the facts as stated in the complaint are inaccurate and the allegations unfounded, I request that the Office of the General Counsel make a recommendation to the Commission that no action be taken and the file be closed.

Sincerely,

Carroll K. Gordon

Carroll K. Gordon
Assistant Treasurer, Gene Taylor
for Congress Committee

9604373245 8

Exhibit 5

Mississippi Press, Sept. 13, 1994

Barlos helped to file complaint against Taylor

By ROB HOLBERT
Mississippi Press Staff

The George Barlos for Congress Committee announced today that it will file a complaint with the Federal Election Commission (FEC) alleging that incumbent Cong. Gene Taylor, D-Bay St. Louis, and his staff have misused their office to intimidate voters.

The complaint, when filed, will be the second in this campaign. Last week, the Democratic Congressional Campaign Committee (DCCC) filed a complaint against Barlos and his supporters claiming they have broken laws concerning campaign contributions. Barlos, of Ocean Springs, is the Republican nominee for the Fifth Congressional seat.

This latest complaint alleges that Taylor and his staff have attempted to dissuade constituents from supporting Barlos through threats and intimidation. The text of the complaint specifically mentions an incident involving Chevron USA General Manager Sumerville, of Pascagoula, and a party which was held at his home.

According to the complaint, a private reception was held at Sumerville's home Sept. 27, 1993 in support of Barlos' candidacy. The Barlos campaign committee alleges that before the date of the party, Taylor, his Chief of Staff Wayne Wiedie or others on the staff contacted Chevron corporate headquarters to complain about Sumerville's support of Barlos.

"As a result of those illegal contacts, the Chevron national corporate headquarters then contacted Mr. Sumerville and influenced him to desist in his and his wife's support for the Barlos campaign," the complaint reads.

When contacted by *The Mississippi Press*, Sumerville said a reception was held, but it "was not connected with Chevron in any way." He said neither he nor

See COMPLAINT, Page 10-A

Complaint —

From Page 1-A

his wife were contacted by Taylor or his staff.

"All I know, is I was never contacted by the Congressman or his staff," Sumerville said.

He stressed that the party was private and not associated with Chevron and that he was not even present.

Carroll Gordon, Taylor's campaign manager, said they would have no comment on the complaint, as it has not yet been filed with the FEC.

"I can't say anything about it until I see the final complaint from the FEC. We're not going to say anything if it's not filed," Gordon said.

Barlos said his group will file the complaint because he has met many people who say they would support his campaign, but are afraid Taylor will somehow retaliate against them. He hopes the FEC will open an investigation into the allegations.

"People have told me they wanted to contribute to my campaign, but they don't because they are afraid Gene will get them," Barlos said. "We want to see it investigated. These things have been repeated several times, over and over. The campaign has been warped by this type of intimidation."

9604373245 9

Exhibit 6 Pascagoula Paper

Letters

Congress fails on ecology

To the Editor:

The very low to zero grades given to Gene Taylor and Trent Lott by the Washington-based League of Conservation Voters, noted on the front page of *The Mississippi Press*, 3/1/94, is further proof that Congress is failing the country in its less than zealous efforts to guard the environment.

I believe that until we have term limitations, Gene and Trent will have to vote with the big money and industry every time to ensure re-election.

One opportunity, among many, available now to [illegible] their pitiful [illegible] encourage the use of recycled products, especially plastic lumber made from recycled water and milk jugs.

What with the building boom due to the population explosion devouring our natural resources to an unsustainable level, we must foster the competitiveness of such recycled products as plastic lumber if we are to save our forests and keep America green.

When campaigning, our politicians promise a "balance" between environment and industry, as if the two have to be at odds and that protection of the environment is not as good for industry as it is for everyone.

After election, these same politicians give us ZERO environmental performance — SOME BALANCE!!!

James M. Sharp
Pascagoula, Miss.

Charges anti-family image

To the Editor:

I read with interest Gene Taylor's recent reply to a constituent who had expressed concern that we have a liberal representing us in Congress.

I, too, am concerned and hope that in the coming election we can elect someone who really is Conservative and who will not have to be accountable to the Liberal Democratic leadership.

We need someone who will not have to vote every year for Tom Foley as House Speaker; someone who will not have to wait in the wings to see if his vote is needed for passage of a bill while he pretends to be "undecided;" someone who will put his office allowance money to good use rather than send it to the House leaderships for redistribution to Liberal Democrats (no, that money did not go back into the treasury).

Gene Taylor is certainly accountable to the House leadership. He voted with them in opposing Desert Storm and voted with them on NAFTA.

Taylor says he never voted for teaching homosexuality in schools. He supports those who support such teaching and has voted against the school choice bill.

As a woman, I resent Mr. Taylor leaving his family behind while he lives on a houseboat, the classic T.V. image of the free wheeling playboy. The national image of Mississippi suffers enough without a Congressman presenting such an anti-family public image.

Carolyn M. Buttross, M.D.
[illegible], Miss.

Commends two senators

To the Editor:

Like most Mississippians, I am concerned about the education bills before our Legislature.

I have had the opportunity to attend numerous committee meetings and public hearings in addition to observing the debate in both chambers. Neither Sen. Musgrove nor Rep. McCoy have wavered in their commitment to our children having the best possible education. Both are honest, honorable men who give countless hours of thought and study to the matters before their committees.

I believe we are doing Mr. McCoy, Mr. Musgrove, their committees, and our children a grave disservice to imply any personal relationship would prevent their doing what they believe is in the best interest of our state.

Jane Boykin, president
Mississippi Forum on Children and Families
[illegible]son, Miss.

Raps law on school district

To the Editor:

We regret that the laws of Mississippi deny Pascagoula citizens (taxpayers) permission to separate the Pascagoula Municipal School District into Pascagoula and Gautier school districts.

Our group remains active in support of ONE high school to be built in Pascagoula. It should be noted that the TWO high school bond issue apparently has no plans to build a football field in Gautier, so students from Gautier would still have to share the football stadium — as well as the Vo-Tech Center.

Two high schools will cost about twice the costs of operating one high school. The money saved by operating [illegible] maintaining [illegible] junior high sc[illegible]ls.

Mr. Floyd Li[illegible] in Quality Ass[illegible]ance and I are insp[illegible]ting has been owne[illegible] years. When w[illegible] write letters to [illegible] in maintaining [illegible] and we may w[illegible] fou[illegible]

Please conti[illegible] voting NO on [illegible] two

Doris [illegible]
Pascag[illegible]la, M

Most seni[illegible]r ni[illegible]

To the Editor

As a memb[illegible] you to know [illegible] Clinton Health [illegible]

Under the [illegible] surely face dra[illegible] their right to c[illegible] waiting lines, [illegible] medical treatm[illegible]

These matt[illegible] available at no [illegible] ber Seniors Co[illegible] Coalition today [illegible] their report, th[illegible] in our area to [illegible] Health Care Pl[illegible]

Laurine S. H[illegible]k, Pa
G.L. and Ma[illegible]ne B[illegible]
Velma Hollin[illegible]wort
Mr. and Mrs. Henr[illegible]
Miss.

Concerns [illegible]or h[illegible]

To the Editor:

—The recent d[illegible]th of Lewis has spark[illegible] an tutes a healthy h[illegible]art. [illegible] there will be mo[illegible] rese[illegible] heart beat prope[illegible]y, wh[illegible] not.

Millions of pe[illegible]le su[illegible]tions and the lik[illegible] The trollable twitchi[illegible] sens spasm in your arr[illegible] or leg frightening.

Ironically, ma[illegible] phy[illegible]

THE FAR SIDE By GARY LARSON

The [illegible] stored back at me, his [illegible]

SHERWIN WILLIAMS
SPRIN
PAIN
Sale

Exhibit 7 **LETTERS** The Sun-Herald

So? Courts don't fret over multiple standards

Reference Larry W. Phillips' letter of April 13, "Local justice system lacks strong leadership," and his comment on the quote from Sheriff Joe Price: I strongly suspect the motive for Phillips' letter is revealed in the last line, "except for the 59 days I spent in Joe's jail."

Mr. Phillips' M.S. probably doesn't impress Joe at all. A rectal thermometer has degrees, but old Joe has the keys to the hoosegow.

As to his reference to the apparent differing constitutional standards practiced by Harrison County officials, so what? The Congress, the stupid courts and dipsticks like the retiring Supreme Court Justice Harry Blackmun seem to have no trouble at all applying different standards to different regions. Joe has more sense in his old Hillary Clinton than the court has demonstrated over the last half century. Justice Hughes said, "The Constitution is what *the court* says it is." Why not Joe?

Prison libraries, my aching rear end! Seventy-five percent of the inmates at any given time can neither read, write or think. The crime is not in misplacing the books but in squandering the taxpayers' money in the first place.

I vote to give Joe the authority of the Singapore courts. That's the way to reduce the prison population. Apply that cane just right and I guarantee you they won't be back. Recidivism will shrink to zilch.

Stop picking on Joe; he'll be there when Mr. Phillips finishes his doctoral dissertation, which will apparently be quite a long time. "Long live old Joe!" (The man, not the condition.)

ROBERT W. WALTERS
Biloxi

Put human safety ahead of profit

Much too often, we witness the lack of concern that some industries have had, not only about the environment but about human safety in general.

Of course, we are not simply talking about pollution. That would be much easier to address. Unfortunately, the problem is widespread and more difficult to control. We might say that it boils down to one factor: profit margin. There is certainly nothing wrong with making a profit, but lack of consideration for human safety in the process is.

The news media have exposed numerous cases involving this carelessness. We have seen illegal dumping of waste and medical supplies in order to save on proper disposal costs. Unsafe aircraft are flown to avoid expensive replacements; laborers often work in unsafe conditions so employers can reap a better profit. Companies try to market surgical implants and drugs that have yet to be thoroughly tested, and the list goes on.

True, we do have government agencies that help reduce the level of fraud, waste and abuse. However, it is not enough to bring this problem to a halt. One cannot say that all industries are motivated by greed, but the corrupt practices of some cast an ugly shadow on the business community. The best we can hope for is that the priority of the industries would be human safety first and profit second.

TAMECO M. WILSON
Gulfport

April 27, 1994 Wednesday

Living on a houseboat creates negative image

After I expressed concern that U.S. Rep. Gene Taylor clandestinely supports the liberal agenda, I received five negative responses. First, a personal phone call from Taylor. He was rude and nasty attacking my personal integrity and calling me a liar and one of those "greedy doctors." I believe he initiated four letters to the editor from cronies, all men. There was even one from Texas, reminding me of the out-of-state letters editors have received supporting Camp Sister Spirit at Ovett. All deliberately avoided the main issue: Does Taylor support liberal House leadership? Yes, he does. It is a matter of record. His recurring votes for Foley as Speaker of the House cannot honestly be denied.

At every campaign stop Taylor brags about giving part of his pay raise to scholarships. Many of us give to school/scholarship funds but do not demand a fund be named after us, using disadvantaged students for personal publicity purposes. We certainly don't think giving to others qualifies one to be a congressman.

Despite Taylor's statements, our ports greatly benefit from free trade. Thousands more Mississippians will go to work in the next five years because of the trade agreements like NAFTA and the GATT. Taylor is somewhat blind to this fact.

I have been a vocal supporter of pro-life, pro-family, anti-pornography and other traditional-values-oriented groups. Even in those heated and emotional debates, I have not been so viciously attacked as I have been by Taylor and his four literary hit-men.

Mississippi suffers national image problems. I am still concerned when a U.S. congressman (no matter who he is) leaves his family, goes to the big city and lives on a houseboat, it will create in most people a negative image. Our image needs more building up than that.

CAROLYN M. BUTTROSS
Ocean Springs

Why complain about four-to-one payback?

The editor's note at the end of the Cal Thomas column appearing in the April 14 issue of The Sun Herald stated that the total revenue loss for Mississippi is $1.827 billion sent to Washington in the form of federal taxes. I question the use of the words "revenue loss" since many published articles indicate that Mississippi receives almost four times this amount from Washington in the form of welfare payments and other forms of "transfer" payments.

If this four-for-one factor is reasonably correct, is sounds like a pretty good deal for the state. Would you be kind enough to let readers know the whole story?

THOMAS H. MOHAR
Gautier

■ EDITOR'S NOTE: Regardless of what Mississippi receives in welfare and transfer payments, the additional amount Mississippians will send to Washington because of the tax increase is $1.827 billion. The point of Thomas' column is that the $1.827 billion would have been circulating directly in the state's economy but for the tax increase.

Now it's too late to say 'I love you'

A few months ago I lost my mother, not to death, but to a very bad stroke. My mother and I never got along. We had times when we hated each other. We had a other times when we loved each other, but things were never right between us.

The stroke left my mother bedridden, unable to think or talk because of the brain damage. Now we can never get things right between us (unless it's God's wish). We can never talk to each other again, never hold each other and say "I love you."

I just want to say if you're fighting with your mother or father, get things right. You never know when life's blows will hit you. No matter what the past was, make up before it's too late. I wish I could. I wish I could put my arms around my mother and tell her how much she really means to me and have her understand what I am saying. I miss the talks we did have when we were not fighting. I miss her smile and right now, I even miss the fighting. Everything is gone.

Now she is in a nursing home, just lying there.

I think a stroke is worse than death. With death, it's all over; a stroke is just like sitting there watching a dead person live. I go to the nursing home almost every day and it kills me to see her just lying there.

There is nothing I can do to save my mother, but maybe I can help someone else.

Mothers (and fathers), if you have a favorite child, don't show it. This hurts deep down . . . even though we say we don't care, we do. If you drink and are abusive, stop now. If you think you hate each other, take a good look and see what you may lose. We say a lot of things and do a lot that we don't mean to do, but for now, say I'm sorry and I love you. Is all the fighting, hurting, holding a grudge worth it? You won't think so when your loved one has a stroke or is dead. Do what you can to make up now. Don't wait until it's too late. Loving someone is harder than hating someone.

PAMELA STENNETT
Gulfport

SAIDLINES

There is nothing in the universe that I fear but that I shall not know all my

DOONESBURY BY GARRY TRUD

Exhibit 8

9604372432

96043732463

LAW OFFICES OF
PILLSBURY MADISON & SUTRO
POST OFFICE BOX 7880
SAN FRANCISCO, CALIFORNIA 94120
TELEPHONE (415) 983-1000
TELECOPIER (415) 983-1200

LOS ANGELES
SAN JOSE
WASHINGTON, D.C.
SAN DIEGO

ORANGE COUNTY
SACRAMENTO
MENLO PARK
TOKYO
HONG KONG
NEW YORK

WRITER'S OFFICE AND
DIRECT DIAL NUMBER

235 Montgomery Street
(415) 983-1968

November 23, 1994

NOV 25 10 19 AM '94
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

VIA FEDERAL EXPRESS

Mary L. Taksar
Attorney
Central Enforcement
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Matter Under Review 4115

Dear Ms. Taksar:

This firm represents the Chevron Corporation (the "Corporation") and Mr. and Mrs. Graham Somerville and, jointly with John J. Fitzpatrick, Jr., Senior Counsel of the Corporation's Law Department, we are responding to the Commission's letters to the Corporation and Mr. and Mrs. Somerville dated November 8, 1994. Mr. and Mrs. Somerville received their copy of the letter on November 12, 1994. As you know, we were not aware that the Corporation was a potential respondent in this MUR until November 18, 1994, when we discussed this matter with you.

We have discussed the allegations set forth in the Complaint with Mr. and Mrs. Somerville, as well as with various other employees of the Corporation. The following summarizes the events which the Complaint filed by the George Barlos for Congress Committee alleges constitute a violation of the Federal Election Campaign Act of 1971, as amended:

Mr. Somerville is the General Manager, Pascagoula, Mississippi Refinery, Chevron U.S.A. Products Company.

Mrs. Somerville first met Mr. Barlos at a Republican Women's luncheon in 1993. She subsequently agreed, as a personal favor to two friends, to host a reception for Mr. Barlos at her home on September 27, 1993. Mrs. Somerville

9604373324554

simply provided the use of her home for the event; neither she nor Mr. Somerville provided any refreshments or anything else of value for the event. Other individuals paid all costs incurred in connection with the reception. Mr. Somerville did not attend the reception.

Mrs. Somerville voluntarily offered the use of her house as a private citizen. This activity was in no way related to Mr. Somerville's employment by the Corporation. The Corporation did not sponsor the reception, reimburse Mr. and Mrs. Somerville (or anyone else) for the reception expenditures, or provide anything of value in connection with the reception.

Mr. and Mrs. Somerville have never been contacted by Congressman Taylor or his staff regarding either the September 27, 1993 reception or the Corporation's alleged support of Mr. Barlos. In addition, neither Mr. Taylor nor any of his staff attempted to intimidate the Corporation into supporting Mr. Taylor or withholding support from Mr. Barlos.

Finally, the Corporation did not intimidate, coerce, or in any way attempt to influence, its employees into supporting Mr. Taylor or withholding support from Mr. Barlos.

If we may be of any further assistance to you in this matter, please do not hesitate to contact me (415-983-1968) or Mr. Fitzpatrick (415-894-1502).

Very truly yours,

Teresa Craigie Lahaderne

Teresa Craigie Lahaderne

cc: Mr. and Mrs. Somerville

J. J. Fitzpatrick, Jr., Esq.

9604373245 5

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4115

NAME OF COUNSEL: Teresa C. Lahaderne, Esq.
Pillsbury Madison & Sutro
235 Montgomery Street, Room 1342
San Francisco, CA 94104
(415) 983-1968 - Telephone
(415) 983-1200 - Fax

John J. Fitzpatrick, Jr., Esq.
Senior Counsel
Chevron Corporate Law Department
575 Market Street, Room 956
San Francisco, CA 94105
(415) 894-1502 - Telephone
(415) 894-8468 - Fax

The above-named individuals are hereby designated as my counsel and are authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/18/94
Date

Rod L. Hartung
Vice President, Public Affairs
Chevron Corporation

RESPONDENT'S NAME: Chevron Corporation

ADDRESS: 225 Bush Street
San Francisco, CA 94104

BUSINESS PHONE: (415) 894-1502

95043132466

FEDERAL ELECTION COMMISSION
SECRETARIAT
MAR 21 10 05 AM '96

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT **SENSITIVE**

MUR #: 4115
DATE COMPLAINT RECEIVED:
November 1, 1994
DATE OF NOTIFICATION: November 8, 1994
DATE ACTIVATED: October 3, 1995

STAFF MEMBER: Eugene H. Bull

COMPLAINANT: George Barlos for Congress Committee

RESPONDENTS: Gary Eugene (Gene) Taylor
Gene Taylor for Congress Committee
and Caroll Gordon, as treasurer
Wayne Weidie

RELEVANT STATUTES: 2 U.S.C. § 441d (a)

INTERNAL REPORTS CHECKED: Referral Materials

FEDERAL AGENCIES CHECKED: None

95U43732467

I. GENERATION OF MATTER

This matter was initiated by a complaint received from the George Barlos for Congress Committee. The complaint alleges that "Gary Eugene (Gene) Taylor; the 1994 Democratic party nominee for the U.S. House of Representatives in the 5th Congressional District of Mississippi; the Gene Taylor for Congress Committee ("the Taylor Committee"), and Caroll Gordon, as treasurer; and Wayne Weidie, the Chief of Staff at Mr. Taylor's Washington, DC Congressional office, (hereinafter referred to together as "the Respondents"), violated the Federal Election Campaign Act of 1971, as amended ("the Act"), 2 U.S.C. sec. 431 et seq., and the regulations of

the Federal Election Commission ("FEC") implementing the Act, 11 C.F.R. sec [sic] 100.1 et seq., Title 18 S 594 U.S.C., and Title 18 S 603 U.S.C."[1]

According to the complaint, Respondents violated above referenced sections of the United States Code when they purportedly intimidated voters who opposed Gene Taylor's candidacy, illegally used U.S. congressional staff and resources, and failed to include proper disclaimers on roadside and headquarters signs.

In their response through counsel, Respondents deny that any attempt was made to intimidate, threaten or pressure voters who opposed Gene Taylor's candidacy. Respondents also contend that roadside signs without disclaimers were erected by individuals unknown to the Taylor Committee, and that campaign headquarters signs did not require disclaimers.[2]

II. FACTUAL AND LEGAL ANALYSIS

A. Alleged Disclaimer Violation

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that a person making an expenditure for the purpose of financing communications expressly advocating the election or defeat of a clearly identified candidate shall include in the communication the identity of the person or persons paying for such communication, and whether or not such communication was authorized by a candidate, an authorized political committee of a candidate, or its agents. 2 U.S.C. § 441d (a).

The Barlos complaint alleges that large roadside signs and banners without disclaimers appeared in support of Gene Taylor's campaign for reelection. However, the complaint does not

[1] In 1994, Gene Taylor won re-election to the U.S. House of Representatives from the 5th Congressional District of Mississippi with 60% of the vote.

[2] Respondents submit that the Barlos complaint is in retaliation for a complaint which the Democratic Congressional Campaign Committee filed with the FEC against George Barlos *et al* on August 25, 1994.

9 5 0 4 3 1 3 2 4 6 8

provide or suggest any facts or circumstances which would lead this Office to believe that the roadside signs had been erected by or at the direction of Gene Taylor or the Gene Taylor for Congress Committee ("the Taylor Committee"). To the contrary, Mr. Gordon, the Assistant Treasurer of the Taylor Committee, stated in a letter to the Commission that, "[t]here are to our knowledge two signs advocating election of Representative Taylor which have been erected by individuals unknown to us. These signs are outside of our control and, in any event, are estimated to represent an independent contribution less than $250." In light of this express denial of any involvement in these signs by the Taylor Committee and in the absence of evidence to the contrary, this Office recommends that the Commission find no reason to believe that the Taylor Committee violated 2 U.S.C. § 441d (a) in connection with the roadside signs and banners.

On the other hand, the evidence for finding a violation of the Act in connection with at least one of the campaign headquarters signs is more persuasive. Of the two campaign headquarters signs, one appeared on the marquee of the shopping plaza ("the marquee sign"), along with other signs announcing various businesses at the plaza; the other appeared to be a free standing sign along the roadway in front of the shopping plaza ("the roadway sign"). See attachment 1 at 21 and 22. Both signs contained identical wording: *Gene Taylor, U.S. Congress Campaign Office*. However, there are significant differences in the appearance of the two signs.

The marquee sign is similar in size and character to the other business signs featured on the marquee. The name "Taylor" on the sign shows up in an enlarged, bold format while the words "U.S. Congress" and "campaign office" appear in substantially smaller, non-bold print. Consequently, the sign appears only to identify the location of the campaign headquarters. In

9 6 0 4 3 7 3 2 4 6 9

contrast, the roadway sign does not appear to have identifying the campaign headquarters location as a primary purpose. The words "campaign office" appear in relatively small cursive script below a much enlarged and boldfaced "TAYLOR, U.S. CONGRESS." The sign itself is unique since it appears that none of the other businesses advertised on the marquee of the shopping plaza are also advertised by additional signs placed along the roadway. Moreover, except for the barely noticeable "campaign office" in relatively small cursive script at the bottom of the sign, the roadway sign has all the hallmarks of a customary campaign sign, subject to the disclaimer requirements of the Act.

In MUR 3960, the Commission rejected the suggestion of Ed Whitfield, Whitfield for Congress, and E.O. Whitfield, as treasurer, that locating campaign signs inside the windows of a campaign headquarters obviates the disclaimer requirement. The Commission said that while an argument could be made that authorization of the sign may be apparent from its location in the front window of a campaign headquarters, to satisfy the requirements of the Act, the disclaimer must give notice of both authorization and who paid for the communication. 2 U.S.C. § 441d (a). Thus, a communication such as the roadway sign here which expressly advocates the election or defeat of a clearly identified candidate is not exempt from the disclaimer requirements simply because of its proximity to the candidate's campaign headquarters or words denoting the campaign headquarters.

Therefore, this Office recommends that the Commission find reason to believe that the Gene Taylor for Congress Committee, and Caroll Gordon, as treasurer, violated

9604373247 0

2 U.S.C. § 441d (a) in connection with the roadway sign. Because no evidence of personal involvement by Gene Taylor or Wayne Weidie was shown by the Barlos complaint, this Office also recommends that the Commission find no reason to believe they violated 2 U.S.C. § 441d (a) in connection with the roadway sign. Additionally, this Office recommends that the Commission admonish the Gene Taylor for Congress Committee, and Caroll Gordon, as treasurer, and take no further action with respect to the Committee's Section 441d (a) violation. It is unlikely that this single sign had any appreciable effect on the outcome of the election, see note 1, nor did it appear to have involved a large expenditure. In light of these factors, the recommended disposition would be an efficient use of the Commission's limited resources.

B. Other alleged Violations

The Barlos complaint makes sweeping allegations of voter intimidation and illegal use of U.S. congressional staff and resources accompanied by very little evidentiary support. It alleges that Mr. Weidie and/or other representatives of Gene Taylor's U.S. congressional office, contacted the Chevron Corporation and/or its representatives to complain about a fund-raiser which a Mr. Somerville, President of the Chevron Corporation facilities in Pascagoula, Mississippi, held at his home in support of the candidacy of George Barlos. The complaint further alleges that Gene Taylor made threatening telephone calls to the Mississippi Press newspaper and Dr. Carolyn Buttross of Ocean Springs, Mississippi, in response to his belief that both were opposed to his candidacy.

This Office notes initially that these particular allegations, even if true, would not give rise to violations under the Commission's jurisdiction. Moreover, materials submitted in response to the complaint expressly contradict these allegations. First, Mr. Weidie denied either

9604373247 1

contacting or directing any individual to contact any Chevron official in connection with Gene Taylor's 1994 campaign. Mr. Weidie also denied that either he or anyone associated with Gene Taylor's office contacted Mr. or Mrs. Graham Somerville to complain about any purported support he or his wife may have provided George Barlos. In addition, both Chevron Corporation and Mr. and Mrs. Graham Somerville have denied that Gene Taylor or his staff attempted to intimidate them to support his candidacy or withhold support from Mr. Barlos. See attachment 2 at 2. Furthermore, the allegation that Gene Taylor threatened or attempted to intimidate the Mississippi Press newspaper and/or Dr. Buttross, is undercut by Dr. Buttross' letter to the editor of the Sun Herald on April 27, 1994. Dr. Buttross writes about the telephone call she received from Gene Taylor, which is the call apparently at issue here. Although Dr. Buttross, in the letter, describes Gene Taylor's conduct during this call as "rude and nasty," she nowhere claims to have been intimidated or threatened.

The Federal Election Campaign Act of 1971, as amended ("the Act"), gives the FEC jurisdiction only with respect to the civil enforcement of provisions found in 2 U.S.C. § 431 et seq. and chapters 95 and 96 of Title 26, 2 U.S.C. § 437c (b) (1), and in light of the unsubstantiated and sweeping nature of the allegations, this Office believes that there are insufficient grounds for referring the non-FECA allegations in the Barlos complaint to the appropriate government agencies.

III. RECOMMENDATIONS

1. Find reason to believe that the Gene Taylor for Congress Committee, and Caroll Gordon, as treasurer, violated 2 U.S.C. § 441d (a), but take no further action.

2. Find no reason to believe that Gene Taylor and Wayne Weidie violated 2 U.S.C. § 441d (a).

3. Approve the appropriate letters.

9 6 0 4 3 7 3 2 4 7 2

4. Close the file

Lawrence M. Noble
General Counsel

3/20/96
Date

BY: LGL
Lois G. Lerner
Associate General Counsel

Attachments:
1. Referral Materials
2. Letter from Pillsbury Madison & Sutro, counsel for Chevron and Graham Somerville.

96043732473

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Gary Eugene (Gene) Taylor;	)	MUR 4115
Gene Taylor for Congress Committee	)	
and Caroll Gordon, as treasurer;	)	
Wayne Weidie.	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 26, 1996, the Commission decided by a vote of 4-0 to take the following actions in MUR 4115:

1. Find reason to believe that the Gene Taylor for Congress Committee and Caroll Gordon, as treasurer, violated 2 U.S.C. § 441d(a), but take no further action.

2. Find no reason to believe that Gene Taylor and Wayne Weidie violated 2 U.S.C. § 441d(a).

3. Approve the appropriate letters, as recommended in the General Counsel's Report dated March 20, 1996.

4. Close the file.

Commissioners Aikens, Elliott, McGarry, and Thomas voted affirmatively for the decision; Commissioner McDonald did not cast a vote.

Attest:

3-26-96
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Thurs., March 21, 1996 10:05 a.m.
Circulated to the Commission: Thurs., March 21, 1996 4:00 p.m.
Deadline for vote: Tues., March 26, 1996 4:00 p.m.

bjr

9604373247 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 10, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George Barlos
George Barlos for Congress Committee
P.O. Box 1915
Biloxi, MS 39533-1915

RE: MUR 4115

Dear Mr. Barlos:

This is in reference to the complaint you filed with the Federal Election Commission on November 1, 1994, concerning possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Gary Eugene (Gene) Taylor, the Gene Taylor for Congress Committee and Carroll Gordon, as treasurer ("Committee"), and Wayne Weidie.

Based on that complaint, on March 26, 1996, the Commission found that there is no reason to believe that Gene Taylor and Wayne Weidie violated 2 U.S.C. § 441d (a) of the Act. On that same day, the Commission found that there is reason to believe that the Gene Taylor for Congress Committee and Carroll Gordon, as treasurer, violated 2 U.S.C. § 441d (a). After considering the circumstances of this matter, however, the Commission determined to take no further action against the Committee and sent an admonishment letter. Accordingly, the Commission closed the file in this matter on March 26, 1996.

This matter will become part of the public record within 30 days. The Federal Election Campaign Act of 1971, as amended, allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8). If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Eugene H. Bull
Attorney

Enclosure
First General Counsel's Report

9 6 0 4 3 1 3 2 4 7 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Carroll Gordon, Treasurer
Gene Taylor for U.S. Congress
412 Highway 90, Unit 11
P.O. Box 38
Bay St. Louis, MS 39520

April 9, 1996

RE: MUR 4115

Dear Mr. Gordon:

On March 26, 1996, the Federal Election Commission found reason to believe that the Gene Taylor for Congress Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 441d (a) of the Federal Election Campaign Act of 1971, as amended ("the Act). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

The Commission reminds you that a campaign sign without the appropriate disclaimer is a violation of 2 U.S.C. § 441d (a). You should take steps to ensure that this activity does not occur in the future.

The confidentiality provisions at 2 U.S.C. § 437g (a) (12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

If you have any questions, please contact Eugene Bull, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosure
First General Counsel's Report

cc: Gene Taylor

9 6 0 4 3 1 3 2 4 7 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 10, 1996

Representative Gary Eugene Taylor
814 S. Beach Blvd.
Bay St. Louis, MS 39520

RE: MUR 4115

Dear Mr. Taylor:

On November 8, 1994, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On March 26, 1996, the Commission found, on the basis of the information in the complaint, that there is no reason to believe you violated 2 U.S.C. § 441d (a). Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g (a) (12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

Sincerely,

Lawrence M. Noble
General Counsel

BY:
Lois G. Lerner
Associate General Counsel

Enclosure
First General Counsel's Report

9604332477

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 10, 1996

Wayne Weidie
Office of Representative Gene Taylor
U.S. House of Representatives
Washington, DC 20515

RE: MUR 4115

Dear Mr. Weidie:

On November 8, 1994, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On March 26, 1996, the Commission found, on the basis of the information in the complaint, that there is no reason to believe you violated 2 U.S.C. § 441d (a). Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g (a) (12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

Sincerely,

Lawrence M. Noble
General Counsel

BY:
Lois G. Lerner
Associate General Counsel

Enclosure
First General Counsel's Report

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

9 3 0 4 3 1 3 2 4 7 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Prentice Hall Corporation Systems, Inc.
Registered Agent
Chevron Corporation
32 Lockerman Square, Suite L-100

April 10, 1996

RE: MUR 4115

Dear Sir or Madam:

On November 8, 1994, the Federal Election Commission notified Chevron of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On March 26, 1996, the Commission acted on the basis of the information in the complaint, and closed its file in this matter without taking action against Chevron.

The confidentiality provisions at 2 U.S.C. § 437g (a) (12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt. Please call me at (202) 219-3690 if you have any questions.

Sincerely,

Eugene H. Bull
Attorney

9604373247 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. and Mrs. Graham Somerville
3018 Northwood Avenue
Pascagoula, MS 39567

April 10, 1996

RE: MUR 4115

Dear Mr. and Mrs. Somerville:

On November 8, 1994, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On March 26, 1996, the Commission acted on the basis of the information in the complaint, and closed its file in this matter without taking action against you.

The confidentiality provisions at 2 U.S.C. § 437g (a) (12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt. Please call me at (202) 219-3690 if you have any questions.

Sincerely,

Eugene H. Bull
Attorney

9 6 0 4 3 7 3 2 4 0 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 4115

DATE FILMED 4-24-96 CAMERA NO. 4

CAMERAMAN JMS

9604373248 1